IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

CONSUMER FINANCIAL)	
PROTECTION BUREAU,)	
Plaintiff,)	
V.)	Civil Action No. 1:15-cv-0859-RWS
UNIVERSAL DEBT & PAYMENT)	
SOLUTIONS, LLC; et al.,)	
)	
Defendants.)	

CONSENT MOTION FOR SECOND EXTENSION OF TIME FOR DEFENDANT FRONTLINE PROCESSING CORPORATION TO RESPOND TO THE COMPLAINT

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendant Frontline Processing Corporation ("Frontline") respectfully requests, with the consent of Plaintiff, a second extension of time through and including Tuesday, May 19, 2015 to file an answer, motion or other responsive pleading in this action. In support of this Consent Motion, Frontline shows the Court as follows:

- 1. Plaintiff, Consumer Financial Protection Bureau ("Plaintiff"), filed its Complaint in this action on March 26, 2015. (Doc. 1.)
 - 2. Plaintiff served Frontline on April 6, 2015.

- 3. On April 23, 2015, the Court granted Frontline's Consent Motion for Extension of Time to Respond to the Complaint, and Frontline's deadline to respond to the Complaint is presently on or before May 12, 2015. (Doc. 57.)
- 4. Frontline continues to investigate the allegations raised in Plaintiff's Complaint, and Plaintiff has consented to a one-week extension of the deadline to answer, move, plead, object, or otherwise respond to the Complaint through and including May 19, 2015.

WHEREFORE, Defendant Frontline Processing Corporation respectfully requests a one-week extension of time through and including May 19, 2015 to answer, move, plead, object, or otherwise respond to Plaintiff's Complaint. A proposed order is attached for the Court's convenience.

Respectfully submitted this 7th day of May, 2015.

CONSUMER FINANCIAL PROTECTION BUREAU

/s/ Jonathan B. Engel
Jonathan B. Engel
Admitted pro hac vice
David Dudley
Admitted pro hac vice
1700 G. Street NW
Washington, D.C. 20052
(202) 435-9037
Jonathan.engel@cfpb.gov
david.dudley@cfpb.gov

PARKER, HUDSON, RAINER & DOBBS, LLP

/s/ Scott E. Zweigel
William J. Holley, II
Georgia Bar No. 362310
Scott E. Zweigel
Georgia Bar No. 786616
Tiffany R. Johnson
Georgia Bar No. 638051
1500 Marquis Two Tower
285 Peachtree Center Ave., N.E.
Atlanta, Georgia 30303
(404) 523-5300

Lena Amanti Georgia Bar No. 666825 U.S. Attorney's Office 600 Richard C. Russell Federal Building 75 Spring Street, SW Atlanta, Georgia 30303 (404) 581-6225 (404) 581-6163 Facsimile Lena.amanti@usdoj.gov

Counsel for Plaintiff Consumer Financial Protection Bureau (404) 522-8409 Facsimile wjh@phrd.com sez@phrd.com trj@phrd.com

-with-

LINDQUIST & VENNUM LLP

Kirstin Kanski
Admitted pro hac vice
Bryan R. Freeman
Admitted pro hac vice
4200 IDS Center
80 S. 8th Street
Minneapolis, MN 55402
(612) 752-1076
(612) 371-3207 Facsimile
bfreeman@lindquist.com
kkanski@lindquist.com

Counsel for Frontline Processing Corporation **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing CONSENT

MOTION FOR SECOND EXTENSION OF TIME FOR DEFENDANT

FRONTLINE PROCESSING CORPORATION TO RESPOND TO THE

COMPLAINT using the Court's CM/ECF system, which will send electronic

notification of such filing to all counsel of record.

This 7th day of May, 2015.

/s/ Scott E. Zweigel

Scott E. Zweigel